# Remarks

Docket No.: 0142-0342P

Claims 1-2, 4-18, 21-22, 25-35, 38 and 40-46 are pending in the present application. By this reply, claims 3, 19-20, 23-24, 36-37 and 39 have been cancelled, and new claims 40-46 have been added. Claims 1, 10, 25, 32 and 45 are independent.

The claims have been amended to clarify the invention and to correct informalities according to U.S. practice. These modifications do not add new matter.

#### Rejection under 35 U.S.C. § 101

Claim 32 has been rejected under 35 U.S.C. § 101 because the Examiner alleges that the claimed invention is directed to non-statutory subject matter. Without acquiescing to the Examiner's allegations made in rejecting this claim, to expedite prosecution only, claim 32 and also claim 25 have been amended to include the Examiner's suggested phrase. Accordingly, this rejection is moot and should be withdrawn.

## Rejection under 35 U.S.C. § 103

Claims 1-7, 17-22, 25, 26 and 30-39 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fredlund (U.S. Patent No. 5,666,215). Claims 8, 9, 10, 11, 16 and 27-29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fredlund in view of Leong et al. (U.S. Patent No. 6,687,018). Claims 12, 13, 23 and 24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fredlund in view of Wake et al. (U.S. Patent No. 6,587,861). Claims 14 and 15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fredlund in view of Leiman (U.S. Patent No. 6,469,796). These rejections, insofar as they pertain to the presently pending claims, are respectfully traversed.

In Fredlund, the photo print process has two stages. In the first stage, which is completely "off-line", the customer delivers an exposed photographic film (in physical form) at the photo processing lab, where it is processed (developed). The processed film is scanned and the images are stored in a mass storage in the lab. Then, the owner of the

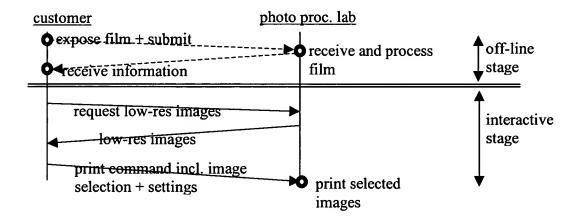
film is sent a slip of paper stating an access code for accessing his images in the mass storage of the lab.

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Then, the second stage of Fredlund may be started by the customer at an arbitrary moment. In the second stage, the customer accesses the lab from his PC via the network and may download low-resolution image versions of his photo images and a user interface program for viewing them on his PC screen from the lab. He may then select individual images for printing, specify print and/or process parameters, and submit those to the lab in a print command. The lab then prints the images.

Below is a diagram explaining this two-stage photo printing process of Fredlund.

## Fredlund:



In clear contrast, Applicants' invention is completely interactive and automated. According to one or more embodiments of Applicants' invention, a user generates and/or edits a document file and submits it from his PC to the print server via the network by selecting a print function on the screen. In fact, this is the "print command". Upon reception, the server automatically stores the document file in a mass storage, and immediately and automatically sends back submission form software or a web page, in which the owner/sender may use to specify print settings.

Then, the user can specify the settings in the web page or the submission form generated by the submission form software, and submit them to the server, using, e.g., a soft key in the web page. The server consolidates the settings and the document file Birch, Stewart, Kolasch & Birch, LLP

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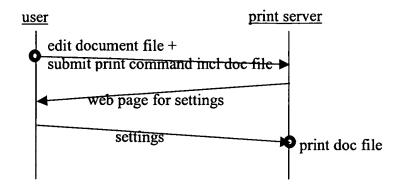
RCS/EHC:sld

explaining this process, just as an example.

already stored in the mass storage, and schedules the file for printing. Below is a diagram

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### **Applicants:**



As can been seen, Applicants' invention is completely interactive whereas Fredlund's process is not. In Fredlund, the photographic film (which the Examiner seems to equate to Applicants' document data) is mailed to or dropped off at the photo lab, and thus in Fredlund, there is no electronic submission of a job request <u>including</u> document data of a document to be printed from a client device to a reproduction center via a network. These features are generally set forth in varying degrees in each of independent claims 1, 10, 25 and 32. In addition, there is no electronic transmission of the job submission form description from the reproduction center to the client device via the network in response to this job request, which is generally set forth in varying degrees in claims 1, 10, 25 and 32.

Furthermore, it would not have been obvious to modify Fredlund to render the claimed invention obvious since Fredlund is involved with processing a photographic film and an end user at the user side would not have the device or technical expertise to export the images on the photographic film into an electronic form, which would be required to teach or suggest the claimed invention, i.e., to electronically submit the job request including the document data. Thus, there is no motivation to modify Fredlund to render the claimed invention obvious. Also the secondary references do not overcome

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these deficiencies of Fredlund since they are merely relied on for teaching conventional printer related features.

Accordingly, independent claims 1, 10, 25 and 32 and their dependent claims (due to the dependency) are patentable over the applied references, and the rejections are improper and should be withdrawn.

#### Conclusion

For the foregoing reasons and in view of the above clarifying amendments, Applicant(s) respectfully requests the Examiner to reconsider and withdraw all of the objections and rejections of record, and earnestly solicits an early issuance of a Notice of Allowance.

The Examiner is respectfully requested to enter this Amendment After Final, in that it raises no new issues but merely places the claims in a form more clearly patentable over the references of record. In the alternative, the Examiner is respectfully requested to enter this Amendment After Final in that it reduces the issues for appeal.

Should there be any outstanding matters which need to be resolved in the present application, the Examiner is respectfully requested to contact Esther H. Chong (Registration No. 40,953) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

Application No. 09/749,664 Amendment dated September 16, 2005 After Final Office Action of June 16, 2005

If necessary, the Commissioner is hereby authorized in this, concurrent, and further replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

Dated: September 16, 2005

Raymond C. Stewart

Registration No. 21,066

BIRCH, STEWART, KOLASCH & BIRCH, LLP

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8110 Gatehouse Road

Suite 100 East

P.O. Box 747

Falls Church, VA 22040-0747

(703) 205-8000

Attorney for Applicant